

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION

RAYNALDO CASTRO AND  
LORRAINE CASTRO,  
INDIVIDUALLY AND ON BEHALF OF  
THE ESTATE OF PAUL WAYNE  
CASTRO  
*Plaintiffs*

V.

GEO REENTRY, INC., JOSEPH  
PAETZOLD AND CHRISTOPHER  
MARTINEZ  
*Defendants*

§ §

No. 2:20-CV-0033 AM-VRG

## JOINT REPORT CONCERNING ALTERNATIVE DISPUTE RESOLUTION

TO THE HONORABLE ALIA MOSES:

COME NOW the Plaintiffs and the Defendants, through their counsel, and submit this alternative dispute resolution report:

1. Status of Settlement Negotiations. Initial discovery in this case is still ongoing and the parties have not yet engaged in settlement negotiations. The parties will make written settlement demand and response pursuant to the scheduling order that requires an exchange of proposals on August 3, 2020 and August 24, 2020. The parties have not engaged in any other formal settlement discussions.
2. Appropriate ADR Method. The parties have concluded that mediation is the most suitable ADR method for this case and agree that mediation should occur after enough discovery is completed to allow the parties to meaningfully evaluate the case. The parties, through their respective counsel, will endeavor to agree on a mediator, determine the

appropriate date for mediation and agree on how best to compensate the mediator. The parties will timely advise the Court of any agreements they reach, as well as any need for judicial assistance in the ADR process.

3. Persons Responsible for Settlement Negotiations. The persons responsible for settlement negotiations, including ADR methods, are the attorneys in charge for each respective party.

4. Certification of Notice to Clients. Plaintiffs and Defendants have been informed by their representative counsel of the methods of ADR recognized by the Western District of Texas.

Respectfully Submitted,

THOMAS C. HALL, P.C.

By: /s/ Thomas C. Hall

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ATTORNEY FOR DEFENDANTS

### **CERTIFICATE OF SERVICE**

I hereby certify service of a true and correct copy of the foregoing instrument on the following interested person(s) on July 6, 2020, via this Court's electronic filing and notification system:

Thomas C. Hall

  
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SHAWN FITZPATRICK